Remarks

The Office Action mailed June 16, 2005 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1-33 and 39-42 are pending in this application. Claims 1-45 stand rejected. Claims 34-38 and 43-45 have been cancelled.

In accordance with 37 C.F.R. 1.136(a), a two month extension of time is submitted herewith to extend the due date of the response to the Office Action dated June 16, 2005, for the above-identified patent application from September 16, 2005, through and including November 16, 2005. In accordance with 37 C.F.R. 1.17(a)(3), authorization to charge a deposit account in the amount of $450.00 to cover this extension of time request also is submitted herewith.

The objection to the drawings for failing to comply with 37 CFR 1.84(p)(5) is respectfully traversed. Applicants have amended the specification to add and/or correct certain reference characters to correspond with the figures. No new matter has been added. Accordingly, Applicants submit that the drawings comply with 37 CFR 1.84(p)(5). For at least the reasons set forth above, Applicants respectfully request that this objection be withdrawn.

The rejection of Claims 16-20 and 32 under 35 U.S.C. § 112, second paragraph, is respectfully traversed. Applicants have amended Claims 16-20 and 32 to address this rejection. Accordingly, Applicants submit that Claims 16-20 and 32 satisfy section 112, second paragraph. For at least the reasons set forth above, Applicants respectfully request that the rejection of Claims 16-20 and 32 under 35 U.S.C. § 112, second paragraph, be withdrawn.

The rejection of Claims 1-10, 21-33 and 43-45 under 35 U.S.C. § 101 as being directed to non-statutory subject matter is respectfully traversed.

The Office Action asserts at page 5 that "none of the recited steps in claims 1-10 are directed to anything in the technological arts". Applicants respectfully traverse this assertion.

However, Applicants have amended independent Claim 1 to address the rejection set forth in the Office Action.

Applicants submit that the claims of the present patent application are directed to practical applications in the technological arts. "Any sequence of operational steps can constitute a process within the meaning of the Patent Act so long as it is part of the technological arts." In re Musgrave, 431 F.2d 882 (C.C.P.A. 1970). For example, independent Claim 1 is a method for generating customer leads for use by dealers attempting to sell a product to a plurality of customers using a computer coupled to a database. Applicants submit that a method for generating customer leads for use by dealers attempting to sell a product to a plurality of customers is a useful process that is considered to be within "the technological arts".

One specific example of such a method implementation is a computer with a processor programmed to at least one of store customer information within a database, apply propensity models to one or more customers stored within the database, apply an activation model and a timing model to one or more customers stored within the database, generate a customer lead list including customers satisfying an early termination model and a cross-selling model or satisfying the activation model, and providing the customer lead list to one or more dealers. While the claims are not limited to the specific examples related to a computer with a programmed processor, the claims need not be so restricted to satisfy the requirement of Section 101.

Applicants further traverses the assertion included in the Office Action that Claims 1-10, 21-33 and 43-45 are directed to non-statutory subject matter under Section 101 in light of the "Examination Guidelines for Computer-Related Inventions". The Examination Guidelines for Computer-Related Inventions provides in relevant part as follows:

> In order to determine whether the claim is limited to a practical application of an abstract idea, Office personnel must analyze the claim as a whole, in light of the specification, to understand what subject matter is being manipulated and how it is being manipulated. During this procedure, Office personnel must evaluate any statements of intended use or field of use, any data gathering step and any post-manipulation activity....Only when the claim is devoid of any limitation to a practical application in the technological arts should it be rejected under § 101.

> Further, when such a rejection is made, Office personnel must expressly state how the language of the claims has been interpreted to support the rejection.

Applicants respectfully submit that Claim 1 is limited to a practical application in the technological arts. Furthermore, Applicants respectfully submit that the Office Action does not expressly state how the language of Claim 1 supports the Section 101 rejection.

Claim 1 has been amended. Claim 1 recites a "method for generating customer leads for use by dealers attempting to sell a product to a plurality of customers using a computer coupled to a database". Thus, Applicants submit that Claim 1 is directed to a useful process that is considered to be within "the technological arts". Furthermore, the method includes the step of "storing customer information within the database...applying propensity models using the computer to one or more customers stored within the database...applying an activation model and a timing model using the computer to one or more customers stored within the database...generating a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model...." Thus, Claim 1 uses a computer and a database to perform at least one step of the process. Claim 1 is therefore directed to a practical application in the technological arts.

Dependent Claims 2-10 depend from independent Claim 1, and these dependent Claims are submitted to satisfy the requirements of Section 101 for the same reasons set forth above with respect to independent Claim 1.

In addition, Claim 21 recites a "computer for generating customer leads for use by dealers attempting to sell a product to a plurality of customers, the computer having a processor and a display, the computer coupled to a database", wherein the computer is programmed to perform specific steps. Claim 21 is therefore directed to a practical application in the technological arts.

Dependent Claims 22-25 depend from independent Claim 21, and these dependent Claims are submitted to satisfy the requirements of Section 101 for the same reasons set forth above with respect to independent Claim 21.

In addition, Claim 26 recites a "database for generating customer leads for use by dealers attempting to sell a product to a plurality of customers", wherein the database includes data corresponding to specific items. Claim 26 is therefore directed to a practical application in the technological arts.

Dependent Claims 27-29 depend from independent Claim 26, and these dependent Claims are submitted to satisfy the requirements of Section 101 for the same reasons set forth above with respect to independent Claim 26.

In addition, Claim 30 recites a "computer program embodied on a computer readable medium for generating customer leads for use by dealers attempting to sell a product to a plurality of customers", wherein the program includes at least one code segment programmed to perform specific steps. Claim 30 is therefore directed to a practical application in the technological arts.

Dependent Claims 31-33 depend from independent Claim 30, and these dependent Claims are submitted to satisfy the requirements of Section 101 for the same reasons set forth above with respect to independent Claim 30.

Claims 43-45 have been cancelled.

For at least the reasons set forth above, Applicants respectfully request that the Section 101 rejection of Claims 1-10, 21-33 and 43-45 be withdrawn.

The rejection of Claims 1-45 under 35 U.S.C. § 103(a) as being unpatentable over Anderson et al. (U.S. Patent No. 6,078,892) ("Anderson") in view of Blume et al. (U.S. Patent No. 6,839,682) ("Blume") is respectfully traversed.

Applicants respectfully submit that neither Anderson nor Blume, considered alone or in combination, describe or suggest the claimed invention. As discussed below, at least one of the differences between the cited references and the present invention is that no combination of Anderson and Blume describe or suggest a method for generating customer leads for use by dealers attempting to sell a product to a plurality of customers that includes storing customer

information within a database including age, gender, income and payment history for each of the plurality of customers including inactive customers, and applying propensity models to one or more customers stored within the database wherein the propensity models includes an early termination model and a cross-selling model, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, and the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer.

Moreover, no combination of Anderson and Blume describe or suggest a method that includes applying an activation model and a timing model to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, and the timing model for predicting when the customers will accept the offer.

Furthermore, no combination of Anderson and Blume describe or suggest a method that includes generating a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer.

Anderson describes a method for retrieving customer lead information from a marketing database. The method includes, as an initial step, assigning scores to customer records in the database. Each of the scores is computed based on a comparison between information in a respective one of the customer records and the product of interest, which scores are then assigned as a quantitative indication of a likelihood of a match between the records and the product. Sales agents may then customize the method by specifying zero or more preferences reflecting the type

of customer that they would like to do business with, e.g., if the agent likes to work with persons of a particular age he may enter an appropriate age range as a preference. After these steps, the method includes searching the database to locate, as a collection of records, customer records which satisfy the one or more preferences specified. The records in the collection are then ordered based on the scores assigned to them in the initial step, and then a predetermined number of them (e.g., the highest-scored records) are output to identify the best customer leads for the product specified and the preferences given. The agent then may select those records which he would like to pursue.

Blume describes predictive modeling of consumer financial behavior using supervised segmentation and nearest-neighbor matching. The method determines likely responses to particular marketing efforts. The method includes applying consumer transaction data to predictive models associated with merchant segments. The merchant segments are derived from the consumer transaction data based on co-occurrences of merchants in sequences of transactions. Merchant vectors represent specific merchants, and are aligned in a vector space as a function of the degree to which the merchants co-occur more or less frequently than expected. Consumer vectors are developed within the vector space, to represent interests of particular consumers by virtue of relative vector positions of consumer and merchant vectors. Various techniques, including clustering, supervised segmentation, and nearest-neighbor analysis, are applied separately or in combination to generate improved predictions of consumer behavior.

Claim 1 recites a method for generating customer leads for use by dealers attempting to sell a product to a plurality of customers using a computer coupled to a database, the method includes "storing customer information within the database including age, gender, income and payment history for each of the plurality of customers including inactive customers...applying propensity models using the computer to one or more customers stored within the database, the propensity models including an early termination model and a cross-selling model, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, the cross-selling model for predicting a probability of cross-selling to a predicted early termination

customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer...applying an activation model and a timing model using the computer to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, the timing model for predicting when the customers will accept the offer...generating a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer...and providing the customer lead list to one or more dealers."

Neither Anderson nor Blume, considered alone or in combination, describe or suggest the method recited in Claim 1. More specifically, neither Anderson nor Blume, considered alone or in combination, describe or suggest a method for generating customer leads for use by dealers attempting to sell a product to a plurality of customers that includes storing customer information within a database including age, gender, income and payment history for each of the plurality of customers including inactive customers, and *applying propensity models to one or more customers stored within the database wherein the propensity models includes an early termination model and a cross-selling model*, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, and the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer. (Emphasis added.)

Moreover, neither Anderson nor Blume, considered alone or in combination, describe or suggest a method that includes *applying an activation model and a timing model to one or more*

customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, and the timing model for predicting when the customers will accept the offer. (Emphasis added.)

Furthermore, neither Anderson nor Blume, considered alone or in combination, describe or suggest a method that includes *generating a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model*, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer. (Emphasis added.)

Although Anderson describes a method for retrieving customer lead information from a marketing database and Blume describes predictive modeling of consumer financial behavior, neither Anderson nor Blume, alone or in combination, describe or suggest applying propensity models to one or more customers stored within the database wherein the propensity models include an early termination model and a cross-selling model, and/or applying an activation model and a timing model to one or more customers stored within the database as recited in Claim 1. Accordingly, Applicants respectfully submit that Claim 1 is patentable over Anderson in view of Blume.

For at least the reasons as set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 1 be withdrawn.

Claims 2-10 depend from independent Claim 1 which is submitted to be in condition for allowance. When the recitations of Claims 2-10 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-10 are also patentable over Anderson in view of Blume.

Claim 11 recites a system for generating customer leads for use by dealers attempting to sell a product to a plurality of customers, the system includes one or more databases of customer information including age, gender, income and payment history for each of the plurality of customers including inactive customers, a server having a plurality of models including propensity models, an activation model, and a timing model wherein the propensity models include at least one of an early termination model and a cross-selling model, a network, and at least one computer connected to the server via the network, the server configured to "apply the propensity models to one or more customers stored within the database, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer...apply an activation model and a timing model to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, the timing model for predicting when the customers will accept the offer...generate a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer...and provide the customer lead list to one or more dealers."

Claim 11, as herein amended, recites a system comprising, among other things, a server configured to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 11 is patentable over the combination of Anderson and Blume for reasons that correspond to those given with respect to Claim 1.

For at least the reasons as set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 11 be withdrawn.

Claims 12-20 depend from independent Claim 11 which is submitted to be in condition for allowance. When the recitations of Claims 12-20 are considered in combination with the recitations of Claim 11, Applicants submit that dependent Claims 12-20 are also patentable over Anderson in view of Blume.

Claim 21 recites a computer for generating customer leads for use by dealers attempting to sell a product to a plurality of customers, the computer having a processor and a display, the computer coupled to a database, the computer programmed to "store customer information within the database including age, gender, income and payment history for each of the plurality of customers including inactive customers...apply propensity models to one or more customers stored within the database, the propensity models including an early termination model and a cross-selling model, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer...apply an activation model and a timing model to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, the timing model for predicting when the customers will accept the offer...and generate a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer."

Claim 21, as herein amended, recites a computer programmed to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 21 is patentable over the combination of Anderson and Blume for reasons that correspond to those given with respect to Claim 1.

For at least the reasons as set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 21 be withdrawn.

Claims 22-25 depend from independent Claim 21 which is submitted to be in condition for allowance. When the recitations of Claims 22-25 are considered in combination with the recitations of Claim 21, Applicants submit that dependent Claims 22-25 are also patentable over Anderson in view of Blume.

Claim 26 recites a database for generating customer leads for use by dealers attempting to sell a product to a plurality of customers, the database including "data corresponding to customer information including age, gender, income and payment history for each of the plurality of customers including inactive customers...data corresponding to applying propensity models to one or more customers stored within the database, the propensity models including an early termination model and a cross-selling model, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer...data corresponding to applying an activation model and a timing model using the computer to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, the timing model for predicting when the customers will accept the offer...and data corresponding to generating a customer lead list including customers satisfying the early termination model and the cross-

selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer."

Claim 26, as herein amended, recites a database including data corresponding to steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 26 is patentable over the combination of Anderson and Blume for reasons that correspond to those given with respect to Claim 1.

For at least the reasons as set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 26 be withdrawn.

Claims 27-29 depend from independent Claim 26 which is submitted to be in condition for allowance. When the recitations of Claims 27-29 are considered in combination with the recitations of Claim 26, Applicants submit that dependent Claims 27-29 are also patentable over Anderson in view of Blume.

Claim 30 recites a computer program embodied on a computer readable medium for generating customer leads for use by dealers attempting to sell a product to a plurality of customers, the program comprising at least one code segment that prompts a user to input customer information and then "stores the customer information within a database including age, gender, income and payment history for each of the plurality of customers including inactive customers...applies propensity models using the computer to one or more customers stored within the database, the propensity models including an early termination model and a cross-selling model, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active

customer of the dealer...applies an activation model and a timing model using the computer to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, the timing model for predicting when the customers will accept the offer...and generates a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer."

Claim 30, as herein amended, recites a computer program embodied on a computer readable medium for generating customer leads for use by dealers attempting to sell a product to a plurality of customers that includes at least one code segment programmed to perform steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 30 is patentable over the combination of Anderson and Blume for reasons that correspond to those given with respect to Claim 1.

For at least the reasons as set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 30 be withdrawn.

Claims 31-33 depend from independent Claim 30 which is submitted to be in condition for allowance. When the recitations of Claims 31-33 are considered in combination with the recitations of Claim 30, Applicants submit that dependent Claims 31-33 are also patentable over Anderson in view of Blume.

Claims 34-38 have been cancelled.

Claim 39 recites an apparatus for generating customer leads for use by dealers attempting to sell a product to a plurality of customers, the apparatus includes "means for storing customer information within a database, the customer information including age, gender, income and payment history for each of the plurality of customers including inactive customers...means for

applying propensity models to one or more customers stored within the database, the propensity models including an early termination model and a cross-selling model, the early termination model for predicting a probability of early termination of a loan by the one or more customers wherein early termination includes a likelihood a customer will terminate a loan provided by the dealer before a contract life of the loan expires by prepaying the loan, the cross-selling model for predicting a probability of cross-selling to a predicted early termination customer wherein cross-selling includes a likelihood a customer will purchase another product from the dealer to retain the early termination customer as an active customer of the dealer...means for applying an activation model and a timing model to one or more customers stored within the database, the activation model for predicting a probability of activating the one or more customers stored within the database including a likelihood that an inactive customer will accept an offer to sell a product from the dealer and become an active customer, the timing model for predicting when the customers will accept the offer...means for generating a customer lead list including customers satisfying the early termination model and the cross-selling model, or satisfying the activation model, wherein an early termination customer satisfying the cross-selling model is an early termination customer predicted to purchase another product from the dealer, and a customer satisfying the activation model is an inactive customer predicted to accept an offer to sell a product from the dealer...and means for delivering the customer lead list to at least one dealer."

Claim 39, as herein amended, recites an apparatus for generating customer leads that includes means for performing steps essentially similar to those recited in Claim 1. Thus, it is submitted that Claim 39 is patentable over the combination of Anderson and Blume for reasons that correspond to those given with respect to Claim 1.

For at least the reasons as set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 39 be withdrawn.

Claims 40-42 depend from independent Claim 39 which is submitted to be in condition for allowance. When the recitations of Claims 40-42 are considered in combination with the

recitations of Claim 39, Applicants submit that dependent Claims 40-42 are also patentable over Anderson in view of Blume.

Claims 43-45 have been cancelled.

In addition, Applicants also respectfully submit that the Section 103 rejection of Claims 1-45 not a proper rejection. Obviousness cannot be established by merely suggesting that it would have been obvious to one of ordinary skill in the art to modify Anderson using the teachings of Blume. More specifically, as is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combinations. It is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the prior art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

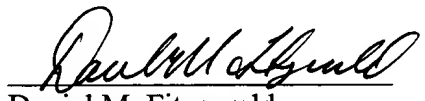
Neither Anderson nor Blume, considered alone or in combination, describe or suggest the combination(s) in Claims 1-45. Rather, the Section 103 rejection of Claims 1-45 appears to be based on a combination of teachings selected from multiple patents in an attempt to arrive at the

claimed invention. Since there is neither teaching nor suggestion for the combination of Anderson and Blume, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason also, Applicants request that the Section 103 rejection of Claims 1-45 be withdrawn.

For at least the reasons set for above, Applicants respectfully request that the Section 103 rejection of Claims 1-45 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



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